

**BEFORE THE**

RM-10767

### REPLY COMMENTS OF

Northrop Grumman Space and Mission Systems Corporation (“Northrop Grumman”), by its

In its Comments, Northrop Grumman detailed the policy and technical reasons why the

Commission's well-reasoned decision to establish a dedicated 2 x 500 MHz section of the FSS

spectrum at 20/30 GHz for use by non-geostationary satellite orbit (“non-GSO”) FSS systems was

correct in 1996, and why it remains correct today. *See* Comments of Northrop Grumman, RM 10767,

at 8-14 (filed October 27, 2003). SES Americom essentially rubber stamps the EchoStar proposal. *See*

SES Americom Comments, RM-10767, at 2-5 (filed Oct. 27, 2003). Hughes too endorses the EchoStar proposal without substantive elaboration, and calls upon the Commission to develop a record on the feasibility of GSO FSS co-primary use of the two bands that are now limited to primary non-GSO FSS use. *See* Hughes Comments, RM-10767, at 2-3 (filed Oct. 27, 2003).

Like EchoStar, neither SES Americom nor Hughes offers anything that even tends to show that co-primary operation of non-GSO FSS systems and GSO FSS networks in the 18.8-19.3 GHz and 28.6-29.1 GHz bands is feasible. In its Comments, by contrast, Northrop Grumman explained that the necessary studies have been done, and that the answer is not conducive to co-primary use of the bands for most types of non-GSO FSS systems. *Id.* at 13-14, 15-17. Moreover, neither SES Americom nor Hughes even attempts to overcome EchoStar's fatal failure to show either that the 2 x 1,000 MHz segments of primary GSO FSS spectrum at Ka-band is insufficient or that there is a shortage of orbital locations from which GSO FSS networks can serve the United States.

In short, the Comments of SES Americom and Hughes do not alter the conclusion advocated by Northrop Grumman that EchoStar's above-captioned Petition must be denied.

Respectfully submitted,

**NORTHROP GRUMMAN SPACE AND  
MISSION SYSTEMS CORPORATION**

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November 12, 2003

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## **CERTIFICATE OF SERVICE**

I, Rochelle D. Johnson, do hereby certify that on this 12<sup>th</sup> day of November, 2003, I sent by U.S. first-class, postage prepaid mail, a copy of the foregoing Comments of Northrop Grumman Space and Mission Systems Corporation to the following:

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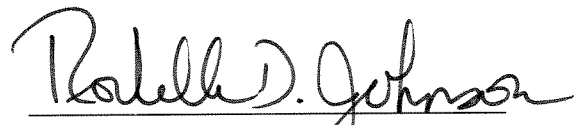
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